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January 26, 2012

Via ECF and Express Mail

The Honorable Michael A. Shipp, U.S.M.J.
 Martin Luther King, Jr. Federal Building &
 United States Courthouse
 50 Walnut Street
 Newark, NJ 07101

Re: *Beverly Clark, et al. v. Prudential Insurance Co. of America,*
Civil Action No. 08-6197 (DRD) (MAS)

Dear Judge Shipp:

Pursuant to the Court's Order dated January 9, 2012 (Doc. No. 182), the parties submit this joint status letter. The parties have completed fact and expert discovery related to class certification issues and there are no discovery-related disputes that require the Court's attention at this time. The parties participated in mediation before Professor Eric Green in New York on November 21, but the case did not settle.

With regard to Plaintiffs' motion for class certification, the parties jointly propose the following schedule:

Filing	Due Date	Page Limit
Plaintiffs' Memorandum in Support of Class Certification	February 22, 2012	75 pages
Defendant's Memorandum in Opposition to Class Certification	April 2, 2012	80 pages
Plaintiffs' Reply Memorandum	April 30, 2012	40 pages
Oral Argument	June 1, 2012, at the Court's discretion ¹	

¹ The parties intend to jointly request that Judge Debevoise specially set oral argument on the Plaintiffs' motion for class certification on June 1, 2012, or a date that is convenient to the Court.

Hon. Michael A. Shipp
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Respectfully submitted,

/s/ Bruce H. Nagel

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cc: All Counsel (via ECF and e-mail)